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individually and on behalf of all similarly
situated.

Plaintiffs.

26 | VS.

27 | GOOGLE LLC,

28 || Defendant.

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

| Case No.: 5:20-cv-03664-LHK

DECLARATION OF ERIKA NYBORG-BURCH IN SUPPORT OF PLAINTIFFS' MOTION SEEKING RELIEF FOR GOOGLE'S FAILURE TO OBEY DISCOVERY ORDER

The Honorable Susan van Keulen
Courtroom 6 - 4th Floor
Date: November 23, 2021
Time: 10:00 a.m.

DECLARATION OF ERIKA NYBORG-BURCH

I, Erika Nyborg-Burch, declare as follows.

1. I am an associate with the law firm of Boies Schiller Flexner LLP, counsel for Plaintiffs matter. I am an attorney at law duly licensed to practice before all courts of the State of York, and admitted *pro hac vice* in this case. (Dkt No. 266). I have personal knowledge of matters set forth herein and am competent to testify.
 2. Attached hereto as **Exhibit A** is a true and correct copy of Google's Responses and Objections to Plaintiffs' First Set of Requests for Production (Nos. 1–19).
 3. Attached hereto as **Exhibit B** is a true and correct copy of the December 14, 2020, letter from Google's Counsel to Plaintiffs' Counsel regarding Google's Responses to Plaintiffs' First Set of Requests for Production (Nos. 1–19).
 4. Attached here to as **Exhibit C** is a true and correct copy of the January 21, 2021, letter from Google's Counsel to Plaintiffs' Counsel regarding Google's Responses and Objections to Plaintiffs' First Set of Requests for Production (Nos. 1–19).
 5. Attached hereto as **Exhibit D** is a true and correct copy of the February 18, 2021, letter from Google's Counsel to Plaintiffs' Counsel regarding the Parties' RFP 10 dispute.
 6. Attached hereto as **Exhibit E** is a true and correct copy of the May 11, 2021, letter to Google's Counsel from Plaintiffs' Counsel.
 7. Attached hereto as **Exhibit F** is a true and correct copy of a document produced by Google, Bates numbered GOOG-BRWN-00028920.
 8. Attached hereto as **Exhibit G** is a true and correct copy of the May 12, 2021, letter from Google's Counsel to Plaintiffs' Counsel.
 9. Attached hereto as **Exhibit H** is a true and correct copy of the September 14, 2021, letter from Google's Counsel to the Special Master.
 10. Attached hereto as **Exhibit I** is a true and correct copy of the September 17, 2021, letter from Google's Counsel to the Special Master.

/s/ Erika Nyborg-Burch
Erika Nyborg-Burch